

# **EXHIBIT K**

TERESA TINGLE-HEPPNER

Page 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BOURNE CO.,  
Plaintiff,

CIVIL ACTION FILE

vs.

NO. 07 Civ. 8580 (DAB)

TWENTIETH CENTURY FOX FILM  
CORPORATION, FOX BROADCASTING  
COMPANY, TWENTIETH CENTURY FOX  
TELEVISION, INC., TWENTIETH CENTURY  
FOX HOME ENTERTAINMENT, INC., FUZZY  
DOOR PRODUCTIONS, INC., THE CARTOON  
NETWORK, INC., SETH MACFARLANE,  
WALTER MURPHY,  
Defendants.

DEPOSITION OF  
TERESA TINGLE-HEPPNER

March 13, 2008

9:29 a.m.

600 Peachtree Street, NE  
Suite 5200  
Atlanta, Georgia

Jennifer D. Hamon, CCR-B-2287, RPR

TERESA TINGLE-HEPPNER

5 (Pages 14 to 17)

| Page 14   | Page 16  |
|---|--|
| <p>1 Q. (By Ms. Stark) You can answer.</p> <p>2 A. I would consider Fox a broadcast</p> <p>3 network.</p> <p>4 Q. These are not trick questions. I'm</p> <p>5 just trying to get my terminology correct.</p> <p>6 So I will refer to it as a telecast,</p> <p>7 then, when I'm referring to Cartoon Network.</p> <p>8 Does the Cartoon Network --</p> <p>9 MR. RIMOKH: One second. I'm sorry.</p> <p>10 Let her finish her question and</p> <p>11 pause before you answer.</p> <p>12 Q. (By Ms. Stark) Does Cartoon Network</p> <p>13 telecast the show "Family Guy"?</p> <p>14 A. Adult Swim telecasts the show</p> <p>15 "Family Guy." They share channel space with</p> <p>16 Cartoon Network.</p> <p>17 Q. Can you explain the relationship to</p> <p>18 me between Adult Swim and Cartoon Network.</p> <p>19 A. The way I view it, they are two</p> <p>20 separate program services that share the same</p> <p>21 channel space, sort of like in the daytime</p> <p>22 hours, it's Cartoon Network, and</p> <p>23 post 11:00 p.m., it's Adult Swim.</p> <p>24 Q. Adult Swim is not owned by Turner?</p> <p>25 A. Yes, it is.</p> | <p>1 compliance with our standards and practices</p> <p>2 guidelines.</p> <p>3 Q. So it didn't matter that the program</p> <p>4 was part of Adult Swim as opposed to part of</p> <p>5 Cartoon Network, did it?</p> <p>6 MR. RIMOKH: Objection.</p> <p>7 Q. (By Ms. Stark) You can answer.</p> <p>8 A. It does matter, because the</p> <p>9 standards are different for the two services.</p> <p>10 Q. I'll rephrase the question, then.</p> <p>11 Your responsibility to review a</p> <p>12 program does not differ regardless of whether</p> <p>13 the program airs on Adult Swim or Cartoon</p> <p>14 Network; is that correct?</p> <p>15 The criteria may differ, but your</p> <p>16 responsibility to review a program does not</p> <p>17 change; is that correct?</p> <p>18 A. That is correct.</p> <p>19 Q. When did Adult Swim start the</p> <p>20 telecast of "Family Guy"?</p> <p>21 A. I don't remember exactly.</p> <p>22 Q. Was it in 1999? 2000?</p> <p>23 A. I don't remember exactly. I think</p> <p>24 it was after that.</p> <p>25 Q. 2001?</p> |
| Page 15   | Page 17  |
| <p>1 Q. Is Cartoon Network also owned by</p> <p>2 Turner?</p> <p>3 A. Yes.</p> <p>4 Q. Do they share the same office space?</p> <p>5 A. No.</p> <p>6 Q. Where are Adult Swim's offices</p> <p>7 located?</p> <p>8 A. Adult Swim is located on Williams</p> <p>9 Street. I don't know the street number.</p> <p>10 Q. And Cartoon Network's office is</p> <p>11 located where?</p> <p>12 A. 1050 Techwood Drive.</p> <p>13 Q. How far away are the offices,</p> <p>14 approximately?</p> <p>15 A. A mile.</p> <p>16 Q. Tell me about your position at</p> <p>17 Cartoon Network. At the time of the airing of</p> <p>18 the Weinstein episode, what was your position?</p> <p>19 A. My title at that time was senior</p> <p>20 vice president standards and practices for the</p> <p>21 Turner Entertainment Group.</p> <p>22 Q. So what was your responsibility with</p> <p>23 respect to the Weinstein episode?</p> <p>24 A. My responsibility for that episode,</p> <p>25 as for all programming, is to ensure</p>  | <p>1 A. I don't remember.</p> <p>2 MR. RIMOKH: I believe, Counsel, you</p> <p>3 can get that information from the other</p> <p>4 witness.</p> <p>5 MS. STARK: I understand.</p> <p>6 Q. (By Ms. Stark) Is "Family Guy"</p> <p>7 broadcast or telecast on any other cable</p> <p>8 network or television network or station or</p> <p>9 channel?</p> <p>10 A. I believe that it airs in</p> <p>11 syndication currently on broadcast networks</p> <p>12 across the country. I know that in addition</p> <p>13 to us airing it on Adult Swim, we also air it</p> <p>14 on TBS and, of course, on Fox.</p> <p>15 Q. On Adult Swim, when was the first</p> <p>16 telecast of the Weinstein episode?</p> <p>17 A. I don't remember the date exactly.</p> <p>18 Q. How many times to date has the</p> <p>19 Weinstein episode been telecast on Cartoon</p> <p>20 Network/Adult Swim?</p> <p>21 A. I don't know.</p> <p>22 Q. Is there a song on the episode</p> <p>23 called "I Need a Jew"?</p> <p>24 A. Yes.</p> <p>25 Q. Let's talk about a topic that you</p>      |

TERESA TINGLE-HEPPNER

6 (Pages 18 to 21)

| Page 18  | Page 20  |
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| <p>1 briefly discussed in the beginning, when we<br/>2 were talking about your conversations before<br/>3 the episode aired.<br/>4 Before Adult Swim aired the episode,<br/>5 take me through the steps that you went<br/>6 through one by one to make the decision<br/>7 whether or not it would go on Adult Swim and<br/>8 be telecast.<br/>9 What was the very first thing you<br/>10 did?<br/>11 MR. RIMOKH: Just to be clear, when<br/>12 you say "you," do you mean her, or do you<br/>13 mean --<br/>14 MS. STARK: I mean the company.<br/>15 She's here's as a representative of the<br/>16 company. She's here identified to discuss<br/>17 that particular issue.<br/>18 Q. (By Ms. Stark) Please tell me what<br/>19 the company did step by step.<br/>20 I'll help you a little bit. How did<br/>21 it come to be that this episode was going to<br/>22 be telecast on Adult Swim?<br/>23 A. As is the case in general, James<br/>24 Bagley, in my department, was the first to see<br/>25 the program. He screened the program and</p>  | <p>1 A. Jim is no longer with the company.<br/>2 Q. So going back to the answers that<br/>3 you gave, you said -- and I may be<br/>4 paraphrasing, so please correct me if I'm not<br/>5 stating it correctly -- as always, James<br/>6 Bagley screened the program.<br/>7 Why is James Bagley the one to<br/>8 always screen the program?<br/>9 A. James's role in the department is to<br/>10 support Cartoon Network and Adult Swim, and he<br/>11 is identified as the first point person to<br/>12 look at programming for those networks.<br/>13 Q. And was Adult Swim/Cartoon Network<br/>14 aware that this episode had not aired on Fox?<br/>15 A. Yes.<br/>16 Q. And had you, meaning the company,<br/>17 had conversations with Fox about why it had<br/>18 not aired?<br/>19 A. I did not.<br/>20 Q. The company.<br/>21 A. I do not know who in the company may<br/>22 have spoken to Fox. I don't know.<br/>23 Q. Did you, in preparation for this<br/>24 deposition, talk to anybody who may have had<br/>25 conversations with Fox about why the episode</p> |
| Page 19  | Page 21  |
| <p>1 wrote the e-mail that you have to Mike Lazzo<br/>2 and Keith Crawford, giving his opinion of the<br/>3 program from a standards and practices point<br/>4 of view and outlining what he thought<br/>5 appropriate next steps were.<br/>6 At some point after that, I recall<br/>7 that Mike Lazzo called me to discuss it and<br/>8 asked me to take a look at it. I screened it<br/>9 and gave Mike my thoughts.<br/>10 Sometime after that, alternate lines<br/>11 were presented for review, and we reviewed<br/>12 those, according to our practice.<br/>13 And then I wrote a memo in an<br/>14 e-mail, which you have, giving my opinion<br/>15 about the program and how it should be<br/>16 handled. And then the decision was made by<br/>17 the network to move forward.<br/>18 Q. Who made the decision?<br/>19 A. I believe that ultimately -- this is<br/>20 my opinion. I believe ultimately it was Jim<br/>21 Samples.<br/>22 Q. Who is Jim Samples?<br/>23 A. Jim Samples, at that time, was the<br/>24 head of Cartoon Network.<br/>25 Q. And what does he do now?</p> | <p>1 didn't air on Fox?<br/>2 A. No.<br/>3 Q. Did the fact that the episode didn't<br/>4 air on Fox enter into your decision-making<br/>5 process?<br/>6 A. No.<br/>7 Q. Why is that?<br/>8 A. We make decisions based on the<br/>9 content of the program. We don't know what<br/>10 other networks' standards and practices<br/>11 guidelines or decision-making is.<br/>12 Q. So just to clarify, you don't know<br/>13 whether anyone spoke with Fox or you don't<br/>14 think anyone spoke with Fox regarding why the<br/>15 episode didn't air on Fox?<br/>16 A. I don't know.<br/>17 Q. With respect to the alternate lines<br/>18 in the program, did Cartoon Network/Adult Swim<br/>19 request the alternate lines?<br/>20 A. My department will identify content<br/>21 that cannot air and refer that back to the<br/>22 network. I do not know what conversations<br/>23 anyone else had in terms of requesting those<br/>24 lines. I wasn't a part of that process. I<br/>25 merely identified the line that I wasn't</p>                                       |

TERESA TINGLE-HEPPNER

7 (Pages 22 to 25)

| Page 22   | Page 24   |
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| <p>1 comfortable with airing.<br/> 2 Q. And what line was that?<br/> 3 A. That was the line "Even though they<br/> 4 killed my Lord."<br/> 5 Q. In the song?<br/> 6 A. In the song.<br/> 7 Q. Was there any other content that you<br/> 8 identified in the episode or in the song that<br/> 9 you were uncomfortable with?<br/> 10 A. No.<br/> 11 Q. So you testified that you identified<br/> 12 this line in the song that you were not<br/> 13 comfortable with. Who proposed the alternate<br/> 14 line? Who proposed an alternate line?<br/> 15 MR. RIMOKH: Objection.<br/> 16 MS. STARK: Basis?<br/> 17 MR. RIMOKH: It's vague and<br/> 18 ambiguous.<br/> 19 Q. (By Ms. Stark) Was an alternate<br/> 20 line proposed for the song?<br/> 21 A. An alternate line was presented to<br/> 22 me at some later point. And it was<br/> 23 acceptable.<br/> 24 Q. Who presented the line to you?<br/> 25 A. Mike Lazzo.</p>   | <p>1 MR. RIMOKH: Thank you.<br/> 2 Q. (By Ms. Stark) Can you tell me what<br/> 3 this is, what this document is.<br/> 4 A. This e-mail has the memo I wrote on<br/> 5 the Weinstein episode.<br/> 6 Q. The one that you just testified to?<br/> 7 A. The one that I just referred to.<br/> 8 Q. And just so we can get the record<br/> 9 clear, is that on page TCN-00014, there on the<br/> 10 bottom right?<br/> 11 A. Yes.<br/> 12 Q. Okay. Continue.<br/> 13 A. And I see comments from other people<br/> 14 and discussion about how we would move<br/> 15 forward.<br/> 16 Q. When you print e-mails, it goes from<br/> 17 the bottom up. So did you receive this full<br/> 18 chain here on this first page, TCN-00013?<br/> 19 A. Yes.<br/> 20 Q. I see your name appears on each one<br/> 21 of these back and forth. So you received<br/> 22 this.<br/> 23 A. Yes.<br/> 24 Q. Turning to your memo on the second<br/> 25 page that you were discussing, I just want to</p>  |
| Page 23   | Page 25   |
| <p>1 Q. What was the line?<br/> 2 A. "I don't believe they killed my<br/> 3 Lord."<br/> 4 Q. Did Mike tell you how that line came<br/> 5 about, how that new line came about?<br/> 6 A. I don't recall.<br/> 7 Q. And you found that line acceptable?<br/> 8 A. Yes.<br/> 9 Q. And once you found that line<br/> 10 acceptable, what actions did you take, based<br/> 11 on that determination, with respect to the<br/> 12 episode and the song? And I say "you,"<br/> 13 meaning the company.<br/> 14 A. I can only respond to what my<br/> 15 department did on that. At that point, I<br/> 16 wrote a memo, which you have in an e-mail, to<br/> 17 Jim Samples, Mark Lazarus, and Phil Kent,<br/> 18 giving my opinion about the program and saying<br/> 19 that with that line changed, I was okay with<br/> 20 it airing.<br/> 21 (Whereupon a document was identified<br/> 22 as Plaintiff's Exhibit 39.)<br/> 23 MR. RIMOKH: Do you have extra<br/> 24 copies?<br/> 25 MS. STARK: I do. I'm sorry.</p> | <p>1 go back to -- I want to go back to exploring<br/> 2 and learning about after you wrote this<br/> 3 memo -- and this memo, you testified that you<br/> 4 wrote this after the alternate line was<br/> 5 approved; correct?<br/> 6 A. That is my memory, yes.<br/> 7 Q. At the very bottom, in the last<br/> 8 paragraph before it says, "Please call," it<br/> 9 says, I do believe CN should use one of the<br/> 10 edited versions that lose -- I assume that<br/> 11 means loses -- the line, quote, even though<br/> 12 they killed my Lord.<br/> 13 Does this refresh your memory as to<br/> 14 the circumstances concerning the edited<br/> 15 version of the episode?<br/> 16 A. I remember that there were alternate<br/> 17 lines available and that they satisfied my<br/> 18 need for an alternate line that was<br/> 19 approvable. I do not know where they came<br/> 20 from.<br/> 21 Q. Is it fair to characterize this memo<br/> 22 to Jim as stating that you recommend airing<br/> 23 this program with that line revised?<br/> 24 A. Yes.<br/> 25 Q. And if you look at the date of this</p> |

TERESA TINGLE-HEPPNER

8 (Pages 26 to 29)

| Page 26   | Page 28  |
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| <p>1 memo, it's dated October 27th, 2003. Does<br/>2 that refresh your memory as to when the<br/>3 program aired?<br/>4 A. I'm sorry. No.<br/>5 Q. Not a month later or six months<br/>6 later?<br/>7 A. No.<br/>8 Q. But it is your testimony that you<br/>9 know that it did air.<br/>10 A. Yes.<br/>11 Q. After you wrote this memo, what<br/>12 happened between this memo and the time --<br/>13 although you can't remember when -- the time<br/>14 that the episode aired?<br/>15 A. I don't have much memory of what<br/>16 happened once the decisions were made and they<br/>17 had my information. I'm sorry. I don't<br/>18 remember much.<br/>19 Q. If you look at the first page, just<br/>20 take a minute to read this chain and see if<br/>21 that refreshes your memory at all.<br/>22 A. My memory is very vague. I mean,<br/>23 all of this is familiar.<br/>24 Q. Can you just tell me generally what<br/>25 this is discussing.</p>   | <p>1 specifics beyond what's on this piece of<br/>2 paper.<br/>3 Q. So in preparation for your<br/>4 deposition, you did not rewatch this episode?<br/>5 MR. RIMOKH: Objection.<br/>6 MS. STARK: Withdrawn.<br/>7 Q. (By Ms. Stark) Have you seen the<br/>8 episode in its entirety, ever?<br/>9 A. Yes.<br/>10 Q. Did you watch it in preparation for<br/>11 this deposition?<br/>12 A. No.<br/>13 Q. When is the last time you saw it?<br/>14 A. Probably -- probably when it aired<br/>15 the first time.<br/>16 Q. But you can't remember when?<br/>17 A. I don't remember.<br/>18 Q. Were there communications between<br/>19 you -- and I mean the company -- and any<br/>20 rabbis concerning the episode?<br/>21 MR. RIMOKH: Objection. Vague as to<br/>22 time frame.<br/>23 Q. (By Ms. Stark) During your<br/>24 consideration of the episode, your review of<br/>25 the episode.</p>  |
| Page 27   | Page 29  |
| <p>1 A. I believe this is discussing the<br/>2 idea of whether the program would be presented<br/>3 with any unusual context as an intro.<br/>4 Q. Such as?<br/>5 A. Someone making commentary about the<br/>6 program.<br/>7 Q. Commentary about the program in what<br/>8 sense?<br/>9 A. I have no really specific memory of<br/>10 what we discussed. Sometimes Adult Swim does<br/>11 different things.<br/>12 Q. Well, you were obviously concerned<br/>13 about the episode. You asked for a line to be<br/>14 changed. What was your concern?<br/>15 A. My concern was that it would<br/>16 possibly offend some viewers.<br/>17 Q. So this first page here talking<br/>18 about an intro using black-and-white cards,<br/>19 would that be an intro discussing the<br/>20 controversy of the episode or some other<br/>21 offensive content in the episode?<br/>22 Is that a fair characterization?<br/>23 MR. RIMOKH: Objection.<br/>24 Q. (By Ms. Stark) You can answer.<br/>25 A. I don't honestly remember any</p> | <p>1 A. Can could you rephrase the whole<br/>2 question, please.<br/>3 MS. STARK: Let me just withdraw the<br/>4 question.<br/>5 Q. (By Ms. Stark) At any time in your<br/>6 memory, were there any communications between<br/>7 you -- and I mean the company -- and a rabbi<br/>8 concerning the Weinstein episode?<br/>9 A. I had no communication with any<br/>10 rabbis when I was considering the show, and I<br/>11 am not aware of any that the company had with<br/>12 any.<br/>13 MR. RIMOKH: She said at any time.<br/>14 THE WITNESS: At any time?<br/>15 Including after it aired?<br/>16 MR. RIMOKH: Including after it<br/>17 aired.<br/>18 Q. (By Ms. Stark) At any time.<br/>19 A. After it aired, I did have a request<br/>20 for copies of the show from two rabbis who<br/>21 found it very funny and wanted it for their<br/>22 personal collections.<br/>23 Q. Who were they?<br/>24 A. Who were they? One was in a<br/>25 rabbinical school where a friend -- the</p> |

TERESA TINGLE-HEPPNER

9 (Pages 30 to 33)

| Page 30   | Page 32   |
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| <p>1 daughter of a friend of mine was training to<br/>2 be a rabbi. It was one of her instructors.<br/>3 And the other was a local rabbi. I don't<br/>4 remember the name.<br/>5 I wasn't able to give them the<br/>6 copies because we don't distribute copies of<br/>7 our programming.<br/>8 Q. And are you aware of any<br/>9 communications that any of the other<br/>10 defendants in this case had with any rabbis<br/>11 concerning this episode at any time?<br/>12 A. I have no knowledge of any.<br/>13 Q. Were there any other communications<br/>14 between you or the company with any other<br/>15 organization, such as a synagogue or the<br/>16 Anti-Defamation League or any type of<br/>17 organization associated with the Jewish<br/>18 community, concerning the Weinstein episode,<br/>19 other than the ones that you testified to<br/>20 already?<br/>21 A. I am not aware of any.<br/>22 Q. What about communications with any<br/>23 of the other defendants in this case?<br/>24 A. I don't understand the question.<br/>25 Q. Are you aware of any communications</p> | <p>1 And subsequently, a final was produced with<br/>2 the alternate dialogue in its place, and that<br/>3 was approved for air.<br/>4 Q. And did it air with the alternate<br/>5 dialogue?<br/>6 A. Yes.<br/>7 Q. The first airing aired with the<br/>8 alternate dialogue?<br/>9 A. Yes.<br/>10 Q. Does "Family Guy" have closed<br/>11 captioning?<br/>12 A. I don't know that for a fact.<br/>13 Q. So would you know whether the lyric<br/>14 had been changed in the closed captioning of<br/>15 the episode?<br/>16 A. I do not know.<br/>17 Q. Should it have been if there were<br/>18 closed captioning?<br/>19 A. Yes.<br/>20 Q. Are you still in standards and<br/>21 practices?<br/>22 A. Yes.<br/>23 Q. Were you in '04?<br/>24 A. Yes.<br/>25 Q. Would you have been responsible for</p>   |
| Page 31   | Page 33   |
| <p>1 between any of the other defendants in this<br/>2 case, Fox, Fuzzy Door, MacFarlane, and the<br/>3 Anti-Defamation League, or any other<br/>4 organizations representing the Jewish<br/>5 community regarding the Weinstein episode?<br/>6 A. No.<br/>7 Q. So I just want to go back to these<br/>8 changes that were made to the episode. Is it<br/>9 your testimony that you don't know how these<br/>10 changes were made?<br/>11 I'm sorry. This one change. Is<br/>12 that this one change to the line of the song?<br/>13 A. I am not clear whether you mean<br/>14 technically or what you mean.<br/>15 Q. Let's go through it, then. You<br/>16 testified that you wanted to change that one<br/>17 line of the lyric, and you asked for it to be<br/>18 changed; is that correct?<br/>19 A. Yes.<br/>20 Q. Take me through the steps of how<br/>21 that got changed.<br/>22 A. Our department communicated to Adult<br/>23 Swim that that line was not acceptable for<br/>24 air. At some point later, they came back to<br/>25 us with alternate lines which were acceptable.</p>    | <p>1 TBS telecasts as well?<br/>2 A. Yes.<br/>3 (Whereupon a document was identified<br/>4 as Plaintiff's Exhibit 40.)<br/>5 Q. (By Ms. Stark) Take a look at that<br/>6 and read it over.<br/>7 Can you tell me what this is.<br/>8 A. Yes. This documents a complaint<br/>9 that we received when this episode aired on<br/>10 TBS from a viewer and that the wrong version<br/>11 of the program aired on TBS by mistake.<br/>12 Q. So just to be clear, this has been<br/>13 marked as Plaintiff's Exhibit 40, and it's<br/>14 TCN-00124 through TCN-00126, and it's an<br/>15 e-mail chain --<br/>16 A. I don't have 126.<br/>17 MR. RIMOKH: She doesn't have 126.<br/>18 Q. (By Ms. Stark) Oh, you don't?<br/>19 MR. RIMOKH: No.<br/>20 MS. STARK: I apologize. We'll just<br/>21 take 126 off. It's not important.<br/>22 To correct the record, it's<br/>23 TCN-00124 and 125, and it is an e-mail<br/>24 chain that is dated between August 13th<br/>25 and August 26th of 2004.</p> |



10 (Pages 34 to 37)

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| <p style="text-align: right;">Page 34</p> <p>1 A. I don't see August 13th.</p> <p>2 Q. (By Ms. Stark) If you look at the</p> <p>3 subject line in the middle of the second page,</p> <p>4 it says, TBS viewer comments for the period</p> <p>5 8/13 to 8/20.</p> <p>6 So my presumption is that the</p> <p>7 comment came in sometime between that time</p> <p>8 period. That's why I'm listing that date.</p> <p>9 So you remember this happening?</p> <p>10 A. Yes.</p> <p>11 Q. And can you just tell me the details</p> <p>12 of what happened.</p> <p>13 A. Apparently, in the library, the</p> <p>14 original Fox version was never pulled from the</p> <p>15 shelf when the replacement master was created.</p> <p>16 And when TBS scheduled the episode, the wrong</p> <p>17 master was pulled -- we were not aware of the</p> <p>18 wrong master still being in the library -- and</p> <p>19 aired.</p> <p>20 We became aware of it because we</p> <p>21 received this viewer complaint, and</p> <p>22 immediately afterwards, we had the wrong</p> <p>23 version that does not have the alternate</p> <p>24 dialogue removed from the library and</p> <p>25 destroyed.</p> | <p style="text-align: right;">Page 36</p> <p>1 e-mail, were there any other actions taken in</p> <p>2 connection with this complaint?</p> <p>3 A. I am not aware of any.</p> <p>4 (Deposition in recess, 10:21 a.m. to</p> <p>5 10:31 a.m.)</p> <p>6 Q. (By Ms. Stark) I just have a few</p> <p>7 more questions, and then we will release you.</p> <p>8 I want to go back to Exhibit 39. Is</p> <p>9 that TCN-0013? Is that 39?</p> <p>10 A. Yes.</p> <p>11 Q. Let's go back to your memo on the</p> <p>12 second page. I just want to direct your</p> <p>13 attention to the center paragraph, where you</p> <p>14 talk about the median age of viewers of the</p> <p>15 "Family Guy."</p> <p>16 It says here the median age of</p> <p>17 viewers watching "Family Guy" is 16.1. Can</p> <p>18 you tell me where you got that information.</p> <p>19 A. From the Turner research department.</p> <p>20 Q. Is that type of demographic</p> <p>21 information something that is part of your</p> <p>22 knowledge base as a standards and practices</p> <p>23 executive?</p> <p>24 A. I'm not sure I understand exactly</p> <p>25 what you're asking me.</p>                    |
| <p style="text-align: right;">Page 35</p> <p>1 Q. And on the first page of this</p> <p>2 document, it says this is from Karen Cassell</p> <p>3 to you. It says, "My gut is to apologize."</p> <p>4 Who is Karen Cassell?</p> <p>5 A. Karen Cassell is the senior vice</p> <p>6 president of public relations for TBS and TNT.</p> <p>7 Q. Is she still?</p> <p>8 A. Yes.</p> <p>9 Q. And did somebody apologize to this</p> <p>10 viewer?</p> <p>11 A. It is my understanding that they</p> <p>12 did.</p> <p>13 Q. It wasn't you, though.</p> <p>14 A. It was not me.</p> <p>15 Q. So you don't know specifically how</p> <p>16 that happened, this apology?</p> <p>17 A. I don't know specifically.</p> <p>18 Q. How does Cartoon Network or Turner</p> <p>19 normally apologize to a viewer?</p> <p>20 A. If the complaint comes by e-mail, we</p> <p>21 generally respond to their e-mail, because</p> <p>22 that's the only contact information we have</p> <p>23 for them.</p> <p>24 Q. Other than destroying the master and</p> <p>25 responding to the complaint by the viewer by</p>  | <p style="text-align: right;">Page 37</p> <p>1 Q. Is this something that you need to</p> <p>2 know to do your job?</p> <p>3 A. Yes.</p> <p>4 Q. And is this something that you know</p> <p>5 to be currently true?</p> <p>6 A. Could you rephrase that for me so I</p> <p>7 answer the right question.</p> <p>8 Q. Currently, is the median age of</p> <p>9 viewers watching "Family Guy" 16.1?</p> <p>10 A. I don't know off the top of my head.</p> <p>11 Q. Did you ever discuss the creation of</p> <p>12 the song "I Need a Jew" with anyone from the</p> <p>13 "Family Guy"? And by "you," I mean you or the</p> <p>14 company.</p> <p>15 MR. RIMOKH: I'm just going to</p> <p>16 object for one second that I don't know</p> <p>17 that that topic of communications with</p> <p>18 anyone from Fox regarding the episode is</p> <p>19 what she's here to talk about, however,</p> <p>20 she can talk about her own personal</p> <p>21 knowledge and what she knows.</p> <p>22 MS. STARK: Well, you identified her</p> <p>23 as being able to talk about any</p> <p>24 instance -- No. 12, any instance prior to</p> <p>25 the filing of the complaint in which any</p> |